

3/22/2017

BY ECF

Honorable Steven M. Gold  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Government Employees Insurance Company, et al., v. Rose Marie Monica Phillip, M.D., et al.*, Index No. 16-cv-04412; Motion to Adjourn Conference Set for March 24, 2017**

Dear Judge Gold:

We write on behalf of Defendants Rose Marie Monica Phillip, M.D., Dr. Varuzhan Dovatlyan, M.D., Arislov Medical, P.C., Harmony Anesthesiology, P.C., Medical One New York, P.C., Park Slope Medical One, P.C., Park Slope Medical One Complete Services, P.C., and Jamaica Medical One, P.L.L.C., (collectively, “Moving Defendants”) to request that the conference currently scheduled for March 24, 2017 be adjourned to April 25th, 2017, at any time convenient for the Court. Plaintiffs have consented to this motion.

The Moving Defendants request this adjournment because there are no pending discovery disputes and settlement discussions have not progressed so far that Court assistance would be helpful.

The parties have been actively engaged in discovery and have exchanged demands. Plaintiffs have returned written responses and have consented to extend Defendants’ time to return written responses until March 31, 2017. No documents have yet been exchanged and there are no discovery disputes pending between the parties.

The parties have engaged in preliminary settlement discussions. Moving Defendants believe that such discussions have not yet progressed far enough for a Court settlement conference to be beneficial.

Additionally, Plaintiffs yesterday filed and served a motion to stay pending No-Fault claims arbitrations filed by Defendants and Plaintiffs. The parties are working out a briefing schedule and do not anticipate it will be fully briefed until May.

Thank you for your consideration of this letter.

Respectfully,

/s/ \_\_\_\_\_

Nicholas Bowers, Esq.

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herein*

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Cc: All Counsel via ECF